

## MAY 1994 STATUS REPORT OF NESHAP AUDIT FINDINGS

### Finding 1 - Reconfiguration of Sampling Lines

Status: A plan for line replacement and/or modification for sampler locations 1 and 9 has been developed. The plan calls for reconfiguration of the sampling lines to eliminate all unnecessary bends with a projected completion date of February 1995 for location #1 and July 1995 for location #9.

### Finding 2 - Personnel Shortage

Status: The personnel shortage issue raised by the USEPA has been re-examined in the context of its intent and recent hiring of temporary employees. Based on this review, it is concluded that the finding is no longer a valid concern.

An off-site course comprising major elements from national training programs conducted by USEPA has been identified with August 19-20, 1994, as the date of the next session. The course includes EPA Method 5 stack sampling as well as air toxic analysis by US EPA methods. Two persons will be scheduled to take the course.

To assure a training program for backup personnel is implemented to support primary personnel in vent sampling activities, four training modules for the vent sampling systems have been developed. The remaining module has been reviewed and should be issued well ahead of the August 1994 completion date.

In view of the recent use of temporary employees and the fact that employee training is and always has been a continuous process, this finding is considered closed.

### Findings 5 & 6 - Calibration Procedures and Calibration Tags

Status: Procedure TSD-532-004, Operational Procedures for the Continuous Vent Stack Samplers, has been revised to reflect more recently defined recalibration schedules, uniform protocols for systems where practical and consistent with other vent sampler operation procedures, such as TSD-532-015. Revisions have been approved and the procedure reissued.

Stack flow measurement units at sampling locations 12, 13, 14, 15 and 16 are the most recent installations and employ an insertion type of mass flowmeter which was not adequately addressed in TSD-532-004 (formerly TSD-523-004). Calibration verification procedures for these units are being developed with an anticipated issue date of July, 1994.

Finding 7 - X-333 BE and X-345 HASA Mass Flowmeter Calibration Protocol

Status: Calibration of the two mass flowmeters X-333 BE and X-345 HASA was completed on 3/30/93 and 3/31/93.

Procedure TSD-532-015, Calibration Schedule for Flow Measurement Devices of the Continuous Vent Stack Samplers, was issued May 15, 1993. This procedure specifies revised calibration schedules as noted under Findings 5 & 6. Review and approval were completed to assure protocol consistency and interpretation with TSD-532-004 (formerly TSD-523-004).

Procedure TSD-532-004, Operational Procedures for the Continuous Vent Stack Samplers, has been revised to reflect the recalibration schedule detailed in TSD-532-015 and to ensure appropriate agreement, protocol consistency and interpretation with other operating procedures of the continuous vent stack samplers. Revisions have been approved and procedure reissued. Finding 7 is closed.

5/27/94

STATUS OF NESHAP AUDIT FINDINGS

<u>Finding:</u>	<u>Scheduled completion</u>	<u>Date completed</u>
(1) Reconfiguration of sampling lines.	4/94	<sup>1</sup> 3/28/94
(2) Personnel shortage.	8/94	5/27/94
(5) Calibration Procedures.	5/94	
(6) Calibration Tags.	7/94	
(7) X-333 BE & X-345 HASA Mass Flowmeter Calibration Protocol.	5/94	5/27/94
(8) Marking and Identification Placement on Flowmeter Components.	1/94	1/28/94
(10, 12, & 13) Repeated High Background Entries in Maintenance Logbooks.	1/94	1/28/94
(16) Tri-Carb. Liquid Scintillation Counter Tracking Number.	1/94	1/28/94

<sup>1</sup>  
(Partial completion as noted in write-up).